

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CENTRAL LABORERS PENSION	)	
FUND, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 12 C 7786
	)	
A.B.D. TANK & PUMP CO.,	)	JUDGE JOAN B. GOTTSCHALL
an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, A.B.D. TANK & PUMP CO., an Illinois corporation, in the total amount of \$23,695.25, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,181.25.

On October 3, 2012, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Kathy Skiba) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on October 24, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 7th day of November 2012:

Mr. Raymond J. Horn, III, Registered Agent  
A.B.D. Tank & Pump Co.  
1515 E. Woodfield Road, Suite 250  
Schaumburg, IL 60173

Mr. Keith Davis, President  
A.B.D. Tank & Pump Co.  
730 Industrial Drive  
Elmhurst, IL 60126

/s/ Patrick N. Ryan \_\_\_\_\_

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